

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CATHOLIC LEGAL IMMIGRATION
NETWORK, INC.,

Plaintiff,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES,

Defendant.

Case No. 8:19-cv-01511-TDC

**THIRD CONSENT MOTION TO EXTEND TIME TO RESPOND TO
COMPLAINT**

Defendant, the United States Citizenship and Immigration Services (the “Defendant”), through its counsel, Robert K. Hur, United States Attorney for the District of Maryland, and Alan C. Lazerow, Assistant United States Attorney for that district, submits this *Third Consent Motion to Extend Time to Respond to Complaint* (the “Motion”).

1. On May 22, 2019, Catholic Legal Immigration Network, Inc. (the “Plaintiff”) filed the *Complaint for Declaratory and Injunctive Relief*, see ECF No. 1 (the “Complaint”), seeking to compel Defendant to disclose records Plaintiff requested under the Freedom of Information Act, 5 U.S.C. § 522 (“FOIA”).

2. On June 18, 2019, Defendant responded to Plaintiff’s FOIA request and produced responsive documents. Defendant released 824 pages in full, released 453 pages in part, and withheld 132 pages.

3. On July 25 2019, the Court entered a Paperless Order extending the time for Defendant to respond to the Complaint to August 7, 2019. See ECF No. 16.

4. After reviewing this matter, Defendant intends on releasing many documents previously withheld in its original production, and re-producing responsive documents. Undersigned counsel has conferred with Plaintiff's counsel, and they are negotiating the timing of that re-production and other related matters. Plaintiff consents to a further extension of Defendant's deadline to respond to the Complaint, *i.e.* through August 12, 2019 (the "Response Deadline").

5. The parties contemplate that, by the Response Deadline, they will update the Court as to the timing of Defendant's re-production and related matters.

6. Michelle S. Grant, Esq., counsel for the Plaintiff, consents to the relief Defendant seeks in the Motion.

WHEREFORE, Defendant requests that the Court grant the Motion and extend the Response Deadline to August 12, 2019.

Respectfully submitted,

Robert K. Hur
United States Attorney

By: /s/
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Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that on this 7th day of August, 2019, a copy of the *Third Consent Motion to Extend Time to Respond to Complaint* was electronically served on all parties receiving CM/ECF notices in this case.

_____/s/
Alan C. Lazerow
Assistant United States Attorney